

**SUPPLEMENTAL COVER SHEET FOR ALL  
ADDITIONAL COPIES**

**FILED**

AUG 04 2008

**CASE NUMBER: 08C50160  
JUDGE KAPALA**

MICHAEL W. DOBBINS  
CLERK, U.S. DISTRICT COURT

**MS. TOY A. COLLINS PO. BOX 1031 ROCKFORD, IL  
61105 V. AMERICAN RED CROSS LOCATED 727  
NORTH CHURCH STREET, ROCKFORD IL. 61103**

**PLEASE FIND ORIGINAL DOCUMENTS FROM TITLE  
VII EMPLOYMENT CIVIL ACTION CASE.**

**PAGES FOUR (4) AND ALL ADDITIONAL NOTARIZED  
DOCUMENTS FOR INCOME STATUS, FACTS OF  
DISCRIMINATION (IN MY OWN WORDS) AND  
CONTACTS FOR LEGAL COUNSEL.**

*Pages 3 and 4 added from original civil case  
Employment Documents*

**CASE # 08C50160**

**FACTS OF DISCRIMINATION IN MY OWN WORDS:**

**ORIGINAL DISCRIMINATION CASE # 440-200609242  
WAS FILED ON OR ABOUT 8/31/06  
RETAILIATION PLUS CASE FILED ON OR ABOUT  
JANUARY 2008**

**I STARTED OFF AS A VOLUNTEER IN THE  
EMERGENCY SERVICE DEPARTMENT IN 1998.**

**BECAME THE COMMUNITY COORDINATOR 10/00.  
MY SUPERVISOR THE HEALTH AND SAFETY  
DIRECTOR BECAME VERY ILL AND I PERFORMED  
HER JOB DUTIES AND MY OWN JOB, ALONG WITH  
SUPPORTING AND TRAINING THE EMERGENCY  
SERVICES DIRECTOR AND HER RESPONSIBILITIES  
TO ENSURE AND TEACH EMERGENCY SERVICE  
DIRECTOR (BEV) HER JOB BECAUSE SHE WAS  
HAVING A TRAUMATIC TIME. I WAS NOT GIVEN  
SUPPORT BY EXECUTIVE DIRECTOR WHEN I WAS  
OUT BECAUSE I WAS TOLD NO ONE KNOWS MY  
JOB, THEREFORE I WOULD BE THE ONLY  
DIRECTOR WITHOUT BACK-UP.**

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**MY SUPERVISOR AT SOME POINT DECIDED NOT TO COME BACK OVER 6 MONTH PERIOD. HER JOB BECAME AVAILABLE DURING THIS TIME, BUT I WAS TOLD BY EXECUTIVE DIRECTOR NOT TO APPLY BECAUSE I WOULD NOT GET THE POSITION BECAUSE SHE LIKED ME WHERE I WAS, BUT SHE WOULD LET ME PART OF THE DECISION ON THE NEW DIRECTOR; INITIALLY I DID NOT APPLY, UNTIL THE PERSON HIRED (TYLER) DID NOT SHOW FOR WORK FOR SEVERAL DAYS.**

**I WAS LATER TOLD IT DID NOT WORK OUT AND I WAS TOLD HE LEFT THE POSITION AND THAT HE WOULD NOT BE BACK. THE POSITION WAS VACANT FOR ANOTHER PERIOD OF TIME. I WAS STILL DOING ALL THE ABOVE POSITIONS.**

**A BOARD MEMBER APPROACHED ME AND ASKS WHEN WILL YOU (TOY) APPLY FOR THE POSITION OF HEALTH AND SAFETY DIRECTOR? BOARD MEMBER TOLD ME YOU'RE DOING THE WORK ALREADY. HE TOLD ME TO APPLY AND THAT HE WOULD SEND A LETTER OF RECOMMENDATION TO THE EXECUTIVE DIRECTOR.**

**AFTER HE TOLD ME THAT HE SENT THE LETTER OF RECOMMENDATION I SPOKE WITH THE EXECUTIVE DIRECTOR AND THE HUMAN RESOURCE PERSON TO ASK IF THEY RECEIVE IT AND IF I COULD HAVE AN INTERVIEW.**

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**I HAD TO STAND IN THE MIDDLE OF THE FLOOR WHILE BOTH OF THEM INTERVEIWED ME. THE HR PERSON OFFER ME \$16000 THAT WAS APPROXIAMATELY \$7,000 LESS THAN WHAT I WAS MAKING. I TOLD BOTH THE HUMAN RESOURCE PERSON AND EXECUTIVE DIRECTOR AT THAT TIME I WOULD LIKE TO MOVE FORWARD, NOT BACKWARDS. THEY BOTH LAUGHED. I LEFT THE INTERVIEW FLOOR.**

**ABOUT TWO MONTHS LATER I WAS CALLED INTO THE EXECUTIVE DIRECTORS OFFICE AND WAS GIVEN THE JOB UNDER VERY HIGH DEMANDS THAT LED TO DOUBLE STANDARDS. I ACCEPTED THE POSITION.**

**UPON ACCEPTING THIS POSITION I WAS TOLD VERBALLY MY OTHER JOBS AND EXPECTATIONS. FOR EXAMPLE: (CLEANING REST ROOMS AND MOPPING THE MANNIKAN ROOM) ECT.**

**A PLANNED DEVISIVE BURGLARY WAS SET UP TO LOOK AS I THE HEALTH AND SAFETY DIRECTOR (TOY) STOLE 2 STAFF PERSONS PERSONNEL FILES FROM A SECURE LOCKED CABINET. I WALKED IN ON THE BURGLARY.**

**ALL DOCUMENTS AND POLICE REPORT ARE AVAILABLE. THE EXECUTIVE DIRECTOR AND HER ROOM MATE, WHOM IS THE HUMAN RESOURCE**  
**4 OF 8**

**PERSON GAVE PERSON (BURGLAR) THE CODE AND A KEY TO GO INTO THE OFFICE AND TAKE CERTAIN FILES. I WAS OPENLY YELLED AT BY THE ROCK RIVER AMERICAN RECORD CROSS CHAIRPERSON BOARD CHAIR FOR GETTING THE ROCKFORD POLICE INVOLVED AT 9PM AT NIGHT. AFTER THE TREATMENT OF BOARD CHAIR (JEFF).**

**PREVIOUS AND UNDER NEW DIRECTION CRUEL THINGS OCCURRED ON OR AFTER FILING FIRST CLAIM WITH EEOC.  
INCIDENT:**

**SECURITY BURGULAR ALARM WAS SET OFF ON ME DURING WORKING AFTER HOURS ON SEVERAL OCCASSIONS**

**PUSH PIN TACKS PUT INTO MY CHAIR**

**PLANT DUMP INTO CHAIR (2XS)**

**SUSPIOUS PHONE CALLS**

**CAR KEYED**

**COMPUTER OUT OF SERVICE SPORATICALLY OVER 3 MONTHS THE LONGEST**

**NO PHONE IN OFFICE FOR OVER A MONTH  
5 OF 8**

**A NEW EXECUTIVE DIRECTOR WAS HIRED LATER AND I EVENTUALLY TOLD HIM THAT I HAD FILED A COMPLAINT WITH EEOC AND THAT I WAS DROPPING THE CASE AND THAT WAS CASE NUMBER 440-2006-09242 THAT IS NOW CONFUSED CASE# 440-2008-01778 DISCRIMINATION; RACE, RETALIATION, AGE, RELIGION,**

**UNDER THE DIRECTION OF THE NEW LEADER I REPORTED THE SABBOTAGE OF MY COMPUTER PHONE AND TOLD HIM AND THE HUMAN RESOURCE PERSON WHO WAS DOING IT.**

**EMERGENCY SEVICE DIRECTOR GAVE ME A NEW NAME OF (TAR BABY) SHE AND THE HUMAN RESOURCE PERSON SHARED THE SAME OFFICE AND WOULD CALL ME IN ALMOST ONCE A WEEK AND QUESTION ME ABOUT VARIOUS THINGS AS IT RELATES TO RELIGION, AFRICAN AMERICANS HISTORY WITH HIV/AIDS AND MY HAIR TEXTURE.**

**REPORTED TO EXECUTIVE DIRECTOR AND HE REDIRECTED ME TO GO BACK AND JUST TALK TO THE HR PERSON.**

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**I WAS NOT ABLE TO COMPLY WITH THE COMPANY POLICY FOR ANY OF MY EMPLOYEES THAT NOT IN COMPLIANCE. THE HR PERSON DID NOT WANT TO HERE IT SHE TOLD ME ON SEVERAL OCCASIONS TO JUST GET OVER IT.**

**WHAT WAS HAPPENING WITH THIS HR PERSON AND PROTOCOL WAS A DUPLICATION OF THE SAME THING THAT HAD HAPPEN PREVIOUSLY WITH HER ROOM-MATE WHICH WAS THE PREVIOUS EXCUTIVE DIRECTOR THAT WAS MY BOSS.**

**I WAS TOLD BY HR THAT I WAS NOT GOING TO GET A RAISE THE UP COMING JANUARY BECAUSE SOME MY STAFF WERE YOUNG AND THEY WILL SOON CHALLENGE ME WITH THEIR ENERGY. I ASK WHEN I WILL RECEIVE MY EVALUATION. I HAD NOT HAD AN EVALUATION FOR APPROXIMATELY 3 YEARS OR MORE.**

**I WAS TERMINATED AS THE HEALTH AND SAFETY DIRECTOR 7/07. ALL MY PERSONAL ITEMS WERE NOT GIVEN TO ME UNTIL I SOUGHT OUT AN ATTORNEY 8 MONTHS LATER.**

**THE ROCK RIVER CHAPTER IS NOW NATIONAL AMERICAN RED CROSS THEY GAVE MY PERSONAL ITEMS TO ANOTHER EMPLOYEE WHO HAD THEM IN HER POSSESION FOR THE PERIOD OF 6 OR MORE MONTHS. ALL ITEMS WERE NOT RETURNED.**

**WITNESS(CARLA) STATED THAT SHE CALLED  
DOWN TO AMERICAN RED CROSS AND WAS GIVEN  
INFORMATION THAT I HAD NOT DID THINGS RIGHT  
AND THAT IS WHY I WAS NO LONGER THERE.**

**ALL IN ALL, MY WEEKLY HOUR WERE TWICE AS  
MANY HOURS AS EVERYONE THAT WORKED FOR  
THE ROCK RIVER CHAPTER AMERICAN RED  
CROSS, AVERAGING 70 HOURS PER WEEK.**

**TOY COLLINS**

*Toy Collins 8/04/08*

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☐ Yes (month) \_\_\_\_\_ (day) \_\_\_\_\_ (year) \_\_\_\_\_

☒ No, did not file Complaint of Employment Discrimination

(b) The plaintiff received a Final Agency Decision on (month) N/A  
(day) N/A (year) N/A.

(c) Attached is a copy of the

(i) Complaint of Employment Discrimination,

☒ YES ☐ NO, but a copy will be filed within 14 days.

(ii) Final Agency Decision

☐ YES ☒ NO, but a copy will be filed within 14 days.

8. (Complete paragraph 8 only if defendant is not a federal governmental agency.)

(a) ☐ the United States Equal Employment Opportunity Commission has not issued  
a *Notice of Right to Sue*.

(b) ☒ the United States Equal Employment Opportunity Commission has issued a  
*Notice of Right to Sue*, which was received by the plaintiff on  
(month) 5 (day) 8 (year) 2008 a copy of which  
*Notice* is attached to this complaint.

9. The defendant discriminated against the plaintiff because of the plaintiff's [*check only those that apply*]:

(a) ☒ Age (Age Discrimination Employment Act).

(b) ☐ Color (Title VII of the Civil Rights Act of 1964 and 42 U.S.C. §1981).

- (c) ☐ Disability (Americans with Disabilities Act or Rehabilitation Act)
- (d) ☒ National Origin (Title VII of the Civil Rights Act of 1964 and 42 U.S.C. §1981).
- (e) ☒ Race (Title VII of the Civil Rights Act of 1964 and 42 U.S.C. §1981).
- (f) ☒ Religion (Title VII of the Civil Rights Act of 1964)
- (g) ☐ Sex (Title VII of the Civil Rights Act of 1964)

10. If the defendant is a state, county, municipal (city, town or village) or other local governmental agency, plaintiff further alleges discrimination on the basis of race, color, or national origin (42 U.S.C. § 1983).

11. Jurisdiction over the statutory violation alleged is conferred as follows: for Title VII claims by 28 U.S.C. §1331, 28 U.S.C. §1343(a)(3), and 42 U.S.C. §2000e-5(f)(3); for 42 U.S.C. §1981 and §1983 by 42 U.S.C. §1988; for the A.D.E.A. by 42 U.S.C. §12117; for the Rehabilitation Act, 29 U.S.C. § 791.

12. The defendant [*check only those that apply*]

- (a) ☐ failed to hire the plaintiff.
- (b) ☒ terminated the plaintiff's employment.
- (c) ☐ failed to promote the plaintiff.
- (d) ☐ failed to reasonably accommodate the plaintiff's religion.
- (e) ☐ failed to reasonably accommodate the plaintiff's disabilities.
- (f) ☒ failed to stop harassment;
- (g) ☒ retaliated against the plaintiff because the plaintiff did something to assert rights protected by the laws identified in paragraphs 9 and 10 above;
- (h) ☐ other (specify): \_\_\_\_\_